

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: ROXANNE LYNNE HERCEG
Debtor

Case No. 17-21194 TPA
Chapter 7

ROXANNE LYNNE HERCEG
Movant

vs.
Municipality of Bethel Park, Columbia
Gas Company, PA American Water,
Penn Credit Corporation
Respondents

DEBTOR'S RESPONSE TO CONVERSION ORDER

Debtor Roxanne Herceg, by her attorney Catherine T. Martin and Neighborhood Legal Services Association, avers as follows:

1. There was no wage attachment in place, therefore the conversion order was not served on any employer.

2. There are four new unpaid unsecured debts incurred between the date of filing and the date of conversion.

<u>Creditor</u>	<u>Nature of debt</u>	<u>Date of Debt</u>	<u>Amount Due</u>
Mun. of Bethel Park c/o Jordan Tax Service 7100 Baptist Road Bethel Park, PA 15102-3908	Sewer bill	service to 7/19/19	\$1195.37
Columbia Gas Co. of PA PO Box 742537 Cincinnati, OH 45274-2537	Gas service	service to 7/19/19	\$70.00
PA American Water PO Box 371412 Pittsburgh, PA 15250-7412	Water service	service to 7/19/19	\$691.63
Penn Credit Corporation PO Box 69730 Harrisburg, PA 17106-9703	QVC bill	6/1/18	\$243.96

3. There are no additional schedules or statements which need to be filed.
4. Debtor is not required to file the Statement of Intention as there are no creditors to be listed on that form.
5. The final report and account of the Trustee has not yet been filed, but Debtor has not acquired any property after the commencement of the Chapter 13 case but before the entry of the conversion order.
6. The final report and account of the Trustee has not yet been filed, but Debtor does not expect there to be any unpaid pre-conversion debts not listed in the Chapter 13 Trustee's final report.
7. There are no executory contracts entered into or assumed after the commencement of the Chapter 13 case but before the entry of the conversion order.
8. There are no claimants under ¶8(b) of the Conversion order, therefore no schedule of such claimants is filed.
9. There is no professional of record upon whom the Court's order of July 19, 2019 may be served.

RESPECTFULLY SUBMITTED:

Date: 8/2/19

/s/Catherine T. Martin
Attorney I.D. No.29049
(412) 586-6118
NEIGHBORHOOD LEGAL SERVICES
ASSOCIATION
Firm No. 213
928 Penn Avenue
Pittsburgh, PA 15222
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CERTIFICATE OF SERVICE

I, Catherine T. Martin, do hereby certify that I have served or caused to be served, on August 2, 2019, a copy of the Debtor's response to conversion order upon the following parties by notice of electronic filing:

Jeffrey R. Hunt on behalf of Creditor Municipality of Bethel Park
jhunt@grblaw.com , cnoroski@grblaw.com

Robert Shearer
information@robertshearer.com , rshearer@ecf.axosfs.com; rspclaw@gmail.com

Luke A. Sizemore on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
lsizemore@reedsmith.com , slucas@reedsmith.com; bankruptcy-2628@ecf.pacerpro.com

James Warmbrodt on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
bkgroup@kmlawgroup.com

Norma Hildenbrand, on Behalf of the United States Trustee by on behalf of U.S. Trustee Office of the United States Trustee
Norma.L.Hildenbrand@usdoj.gov

Ronda J. Winnecour
cmecf@chapter13trusteedpa.com

And service by first class mail was made on the newly added creditors:

Mun. of Bethel Park
c/o Jordan Tax Service
7100 Baptist Road
Bethel Park, PA 15102-3908

Columbia Gas Co. of PA
PO Box 742537
Cincinnati, OH 45274-2537

PA American Water
PO Box 371412
Pittsburgh, PA 15250-7412

Penn Credit Corporation
PO Box 69730
Harrisburg, PA 17106-9703

Respectfully submitted:

/s/Catherine T. Martin

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